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Honorable Lewis J. Liman  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007

Your Honor:

REQUEST GRANTED. August 28, 2021

The time for defendant to submit pretrial motions is extended to September 20, 2021. Government response due by October 4, 2021. Instead of the previously scheduled Motion Hearing, the Court will hold a Status Conference on September 20, 2021 at 12:00PM. The conference will be held remotely by telephone and parties are directed to dial into the Court's teleconference line at 888-251-2909 and use access code 2123101.

9/8/2021

Re: United States v. Chaoyue Zhao, 20 Cr, 129

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

As you are aware, I am the attorney for Chaoyue Zhao in the above referenced proceeding. I am writing to you to request a fifth extension of the time within which to submit pretrial motions in this case until September 20, 2021. The current deadline for the Defendant to file is August 30, 2021.

The United States Attorney has informed me that their office takes no position on my request.

Although I had informed the Court in my motion for a fourth extension that that request would be the final request, I now find it necessary to make one last additional request.

My client is now on release to home confinement. However, that did not occur as soon as I had expected. I have had one visit from my client to my office. Unfortunately, I did not take account for travel time from his home to my office when making the request for that visit and did not have as much time with my client as I needed to review with him voluminous disclosed materials from the Government relevant to his defense.

Therefore, in the interests of full and proper representation of the Defendant and to insure that any pre-trial motion is limited to relief that might actually be available to the Defendant I am asking for this final extension to September 20, 2021.

Thank you for your consideration in this matter.

Sincerely yours,

  
Giacchino J. Russo, Esq

GJR/hq

Cc: Sebastian Swett, AUSA (by ECF), Aline Flodr, AUSA (by ECF)